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*Attorneys for Defendant Everest National Insurance Company*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

BEDROC LIMITED, LLC, a Nevada limited  
liability company,

Plaintiff,

vs.

EVEREST NATIONAL INSURANCE  
COMPANY, a Delaware corporation,

Defendant.

Case No. 2:22-cv-01470-RFB-DJA

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
COMPLAINT**

**(FIRST REQUEST)**

The Parties jointly stipulate that Defendant Everest National Insurance Company's time to respond to Plaintiff's Complaint is extended until **Monday, October 17, 2022**. This is the first extension of time of Defendant's deadline to respond to the Complaint. The extension is a brief extension requested to accommodate defense counsel being recently retained and scheduling conflicts. The current deadline is October 7, 2022, and the requested extension is for ten (10) additional days.

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The Parties hereto preserve and do not waive any objections or defenses by this Stipulation.

**IT IS SO STIPULATED, this 6th day of October, 2022.**

*/s/ Howard J. Russell*

*/s/ F. Thomas Edwards*

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IT IS SO ORDERED:

  
\_\_\_\_\_  
DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

DATED: October 7, 2022

